

1 John D. Fiero (CA Bar No. 136557)
Kenneth H. Brown (CA Bar No. 100396)
2 Victoria A. Newmark (CA Bar No. 183581)
Teddy M. Kapur (CA Bar No. 242486)
3 PACHULSKI STANG ZIEHL & JONES LLP
150 California Street, 15th Floor
4 San Francisco, California 94111-4500
Telephone: 415/263-7000
5 Facsimile: 415/263-7010

6 E-mail: jfiero@pszjlaw.com
vnewmark@pszjlaw.com
7 kbrown@pszjlaw.com
tkapur@pszjlaw.com

8 Attorneys for Heller Ehrman LLP,
9 Debtor and Debtor in Possession

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

12 In re:
13 Heller Ehrman LLP,
14 Debtor

Case No.: 08-32514

Chapter 11

**NOTICE OF DEBTOR'S OBJECTION TO
CLAIM OF ROUSE & CO. INTERNATIONAL
(CLAIM NO. 423)**

[No Hearing Date Set]

17 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY JUDGE;**
18 **THE CREDITORS' COMMITTEE; THE OFFICE OF THE UNITED STATES TRUSTEE;**
AND ROUSE & CO. INTERNATIONAL:

19 **NOTICE IS HEREBY GIVEN** that Heller Ehrman, LLP, formerly known as Heller
20 Ehrman White & McAuliffe LLP, a California limited liability partnership, the debtor and debtor-in-
21 possession in the above-captioned case (the "Debtor"), hereby files its *Objection to Claim of Rouse*
22 *& Co. International (Claim No. 423); Memorandum of Points and Authorities* (the "Objection").

23 **PROCEDURE TO BE FOLLOWED**

24 Bankruptcy Local Rule 9014-1 of the United States Bankruptcy Court for the Northern
25 District of California prescribes the procedures to be followed by anyone who requests a hearing on
26 the relief requested in the Omnibus Objection. Bankruptcy Local Rule 9014-1(b)(3) requires the
27 following:
28

1 a. That any objection to the requested relief, or a request for a hearing on the
2 matter, must be filed and served upon the initiating party within twenty-one (21) days of the
3 mailing of this Notice;

4 b. That a request for a hearing or objection must be accompanied by any
5 declarations or memoranda of law the party objecting or requesting wishes to present in
6 support of its position;

7 c. That if there is not a timely objection to the requested relief or a request for a
8 hearing, the Court may enter an order granting the relief by default; and

9 d. That the initiating party will give at least seven (7) days written notice of the
10 hearing to the objecting or requesting party, and to any trustee or committee appointed in the
11 case, in the event an objection or request for a hearing is timely made.

12 For further information, parties in interest may wish to contact Debtor's counsel, John D.
13 Fiero of Pachulski Stang Ziehl & Jones LLP, 150 California Street, 15th Floor, San Francisco,
14 California 94111-4500, telephone (415) 263-7000.

15 **NOTICE IS HEREBY FURTHER GIVEN** that pursuant to Local Rule 3007-1 of the
16 United States Bankruptcy Court for the Northern District of California, where a factual dispute is
17 involved, the initial hearing on the Objection shall be deemed a status conference at which the Court
18 will not receive evidence. Where the Objection involves only a matter of law, the matter may be
19 argued at the initial hearing.

20 **NOTICE IS HEREBY FURTHER GIVEN** that the Objection may be prosecuted by the
21 Debtor and/or any successor thereof.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

NOTICE IS HEREBY FURTHER GIVEN that, if a timely opposition is received and a hearing set, the initial hearing on the Objection shall be deemed a status conference at which the Court will not receive evidence.

Dated: February 23, 2010

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ John D. Fiero
John D. Fiero

Attorneys for Heller Ehrman LLP,
Debtor and Debtor in Possession